

**UNITED STATES DISTRICT COURT
for the
DISTRICT OF NEW HAMPSHIRE**

**CAROLINE CASEY and MAGGIE
FLAHERTY**

Plaintiffs,

v.

**WILLIAM GARDNER, in his official
capacity as New Hampshire Secretary of
State, and
GORDON MACDONALD, in his official
capacity as New Hampshire Attorney
General**

Defendants.

**NEW HAMPSHIRE DEMOCRATIC
PARTY, By Raymond Buckley, Chair**

Plaintiff,

v.

**WILLIAM GARDNER, in his official
capacity as New Hampshire Secretary of
State, and
GORDON MACDONALD, in his official
capacity as New Hampshire Attorney
General**

Defendants.

Consolidated Case No.: 1:19-cv-00149-JL

PROPOSED PRETRIAL PLAN

The parties have conferred and jointly propose the following plan for pretrial disclosures required by Fed. R. Civ. P. 26(a)(3) and Local Rule 16.2.

Scheduling Designation	Proposed Deadline
Witness Lists	5/15/2020
Designations of Depositions	5/15/2020
Exhibit Lists	5/15/2020
Assented to Statement of Case and Stipulated Facts	5/21/2020
Written Waiver of Claims and Defenses	5/15/2020
Statement regarding JERS	N/A
Itemized Statement of Special Damages	N/A
Statement of Claim of Attorney's Fees	5/15/2020
Request for View	N/A
Estimate of Length of Trial	5/15/2020
Requests For Jury Instructions	N/A
Trial Memoranda and/or Requests for Findings of Fact and Rulings of Law ¹	Two weeks after trial
Motions in Limine	5/15/2020
Proof of Special Damages	N/A
Use of JERS Motions	N/A
Trial	Week of 5/26/2020

¹ Parties will submit either a trial memorandum or requests for findings of facts and rulings of law, unless this Court has a particular preference for one, the other, or both.

The parties reserve the right to revisit the proposed pretrial plan and seek relief from the plan if an opinion from the New Hampshire Supreme Court is not released sufficiently in advance of trial or to revisit the proposed pretrial plan in light of the contents of any such opinion.

Respectfully submitted,

CAROLINE CASEY AND MAGGIE FLAHERTY,

By and through their attorneys affiliated with the
American Civil Liberties Union of New Hampshire
Foundation and the American Civil Liberties Union
Foundation,

Dated: April 30, 2020

/s/ Henry R. Klementowicz

Gilles R. Bissonnette (N.H. Bar No. 265393)
Henry R. Klementowicz (N.H. Bar No. 21177)
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AND

Respectfully submitted,

NEW HAMPSHIRE DEMOCRATIC PARTY,
By Raymond Buckley, its chair

By its attorney,

Dated: April 30, 2020

/s/ Henry R. Klementowicz for

William E. Christie
NH Bar # 11255
S. Amy Spencer
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AND

Respectfully submitted,

WILLIAM M. GARDNER, Secretary of
State of the State of New Hampshire,
in his official capacity, et al.,

By their attorney,

Gordon J. MacDonald
Attorney General

Dated: April 30, 2020

/s/ Anthony Galdieri
Seth M. Zoracki, Bar No. 267887
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CERTIFICATE OF SERVICE

The undersigned certifies that he has electronically has served this pleading on all counsel of record through the court's ECF system.

Dated: April 30, 2020

/s/ Henry R. Klementowicz
Henry R. Klementowicz